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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

THE CENTER FOR INVESTIGATIVE REPORTING and MOHAMED AL ELEW,	)	
	)	Case No. 4:21-cv-09680-HSG
	)	
Plaintiffs,	)	
	)	STIPULATED JUDGMENT
v.	)	[PROPOSED ORDER]
	)	
U.S. ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
	)	
Defendant.	)	
	)	

On August 29, 2022, Defendant extended a Fed. R. Civ. P. 68 offer of judgment to Plaintiffs, in the amount of \$6,000, in total, regarding Plaintiffs' claim for attorneys' fees and costs. Dkt. No. 34. Plaintiffs accepted Defendant's offer on September 7, 2022. *Id.* The Court ordered the parties to meet and confer and file a Proposed Stipulated Judgment. Dkt. No. 34.

Accordingly, the parties agree and stipulate to allow final judgment to be entered in favor of Plaintiffs and against Defendant in the amount of \$6,000, in full satisfaction of Plaintiffs' claim for attorneys' fees and costs.

Respectfully submitted,

STEPHANIE M. HINDS  
United States Attorney

By:                     /s/                      
GIOCONDA R. MOLINARI  
Assistant United States Attorney

The Center for Investigative Reporting

By: /s/ D. Victoria Baranetsky  
D. VICTORIA BARANETSKY  
SHAWN MUSGRAVE  
Attorneys for Plaintiffs

In compliance with Civil Local Rule 5-1(i), the filer of this document attests that all signatories listed have concurred in the filing of this document.

**[PROPOSED] ORDER BASED ON STIPULATION**

**IT IS ORDERED THAT,**

Because Plaintiffs have accepted Defendant's Fed. R. Civ. P. 68 offer of judgment, final judgment is hereby entered in favor of Plaintiffs and against Defendant in the amount of \$6,000, in full satisfaction of Plaintiffs' claim for attorneys' fees and costs.

The Clerk shall close the file.

DATED:

HONORABLE HAYWOOD S. GILLIAM, JR.  
United States District Judge